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7 Attorneys for Defendant
EDUCATIONAL CREDIT MANAGEMENT CORPORATION

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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 LEISA WHITTUM,

13 Plaintiff,

14 vs.

15 EDUCATIONAL CREDIT
16 MANAGEMENT CORPORATION,
a Minnesota non-profit corporation;
17 GC SERVICES, LP, a Delaware
limited partnership; and DOES 1-20,
18 inclusive,

19 Defendants.

CASE NO. 2:18-cv-01495-JAD-CWH

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22 **STIPULATION AND JOINT
REQUEST TO EXTEND TIME FOR
DEFENDANT EDUCATIONAL
CREDIT MANAGEMENT
CORPORATION TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(First Request)

Complaint served: 9/13/18
Current response date: 10/4/18
Proposed new response date: 10/18/18

23 Plaintiff LEISA WHITTUM ("Plaintiff") and Defendant EDUCATIONAL
24 CREDIT MANAGEMENT CORPORATION ("Defendant ECMC"), through their
25 respective counsel, hereby stipulate and jointly request that Defendant ECMC shall
26 have an extension of time, up to and including October 18, 2018, within which to
27 respond to Plaintiff's Complaint on file herein. This is the first stipulation for an
28 extension of time for Defendant ECMC to respond to Plaintiff's Complaint.

1 Defendant ECMC has only recently retained counsel and needs more time to
2 investigate Plaintiff's claims. This joint request is also based on the fact that the
3 requested extension is relatively short, and the parties believe that no currently
4 scheduled Court hearing or other event will be impacted by the extension. The
5 parties further agree that the requested extension is made in good faith, and will not
6 cause any prejudice to them.

7 Respectfully submitted,

8
9 DATED: October 3, 2018 ALVERSON TAYLOR & SANDERS

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11 By: s/Trevor R. Waite
12 Kurt R. Bonds
13 Trevor R. Waite
14 Attorneys for Defendant
EDUCATIONAL CREDIT
MANAGEMENT CORPORATION

15 DATED: October 3, 2018 LAW OFFICE OF BRIAN D. SHAPIRO, LLC

16
17 By: s/Brian D. Shapiro
18 Brian D. Shapiro
19 Attorneys for Plaintiff
LEISA WHITTUM

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21 IT IS SO ORDERED:

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23 
24 UNITED STATES MAGISTRATE JUDGE

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26 DATED: October 4, 2018